

CV 20125679 (KAM) (MDG)

**INITIAL CONFERENCE QUESTIONNAIRE**

1. If not yet made, date for completion of automatic disclosures required by Rule 26(a) of the Fed. R. Civ. P.: 2/1/13.
2. Total number of interrogatories: plaintiff(s) 25 and defendant(s) 25
3. Maximum number of requests for admission: 5
4. Number of depositions by plaintiff(s) of: parties 1-4 non-parties 1-4
5. Number of depositions by defendant(s) of: parties 1-4 non-parties 1-4
6. Number of depositions exceeding 7 hours: parties N/A non-parties N/A
7. Date for completion of factual discovery: 7/16/13
8. Number of expert witnesses of plaintiff(s): N/A medical N/A other (type) \_\_\_\_\_  
Date(s) for expert report(s): \_\_\_\_\_ medical \_\_\_\_\_ other (type) \_\_\_\_\_
9. Number of expert witnesses of defendant(s): 1-4 medical N/A other (type) \_\_\_\_\_  
Date(s) for expert report(s): 8/15/13 medical \_\_\_\_\_ other (type) \_\_\_\_\_
10. Date for completion of expert discovery: N/A
11. Date for motion to amend pleadings by: plaintiff(s) 3/16/13 defendant(s) 3/16/13
12. Number of proposed additional parties to be joined by plaintiff(s) 4 and defendant(s) \_\_\_\_\_  
Date for motion for joinder: 3/16/13
13. Counsel must confer on whether this case involves electronic discovery and any potential issues regarding discovery and disclosure of electronically stored documents, including the form or forms in which it should be produced, any limitations on the types of electronically stored information to be disclosed and the preservation of relevant information that might otherwise be destroyed under a party's routine procedures. Are there any agreements reached regarding electronic discovery or any anticipated issues?  
\_\_\_\_ Yes \_\_\_\_ No ☒ Not Applicable
14. Counsel must discuss the procedures for assertion of claims of privilege or of protection of trial preparation material produced in discovery. Have counsel reached agreements regarding the right of a party to assert privilege after production. See Fed.R.Evid. 502(e). \_\_\_\_ Yes ☒ No
15. Types of contemplated dispositive motions: Summary Judgment
16. Dates for filing any dispositive motion or any request for pre-motion conference: 8/15/13
17. The parties are advised that they may consent to trial, including a jury trial, before a magistrate judge pursuant to 28 U.S.C. § 636(c). If they are prepared to consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c), they may do so at the conference or later in the litigation. They should not indicate which party has declined if both sides do not consent.